

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. : S1 19 Cr. 373 (PGG)

MICHAEL AVENATTI :

Defendant. :

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**DEFENDANT AVENATTI'S NOTICE OF MOTION IN LIMINE  
TO EXCLUDE ALL EVIDENCE OF SETTLEMENT  
COMMUNICATIONS AND NEGOTIATIONS**

PLEASE TAKE NOTICE, that upon the accompanying Memorandum of Law and Declaration of Scott A. Srebnick, defendant Michael Avenatti, pursuant to Rule 501 of the Federal Rules of Evidence, will move the Court, before the Honorable Paul G. Gardephe at the United States Courthouse, 500 Pearl Street, Courtroom 705, New York, New York 10007, for an Order excluding at trial all communications he had with attorneys for Nike from March 19-21, 2019.

Dated: December 10, 2019

Respectfully submitted,

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*Attorneys for Defendant Michael Avenatti*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 2019, I caused a true and correct copy of the foregoing to be served by electronic means, via the Court's CM/ECF system, on all counsel registered to receive electronic notices.

/s/Scott A. Srebnick  
Scott A. Srebnick